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July 18, 1997

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ameritech Michigan Application for InterLATA Authorization, CC Docket No. 97-137.

Dear Mr. Caton:

This ex parte communication is to bring to the attention of the Federal Communications Commission ("FCC" or "Commission") a recent state public utility commission decision that directly relates to Ameritech's application for interLATA authorization in Michigan.

On July 9, 1997, an Administrative Law Judge of the Michigan Public Service Commission ("MPSC") issued a Proposal for Decision ("PFD") in a complaint case filed by the City of Southfield, Michigan against Ameritech Michigan.<sup>1</sup> The PFD is attached to this letter.

The Southfield 911 Complaint case involves allegations by the City of Southfield, Michigan that Ameritech's E911 database did not accurately route E911 calls of a TCG Detroit customer when there was a shooting incident that the customer sought to report. In the PFD, the Administrative Law Judge found for the City of Southfield and against Ameritech. The PFD therefore directly relates to whether Ameritech Michigan provides TCG and other competitive local exchange carriers<sup>2</sup> with nondiscriminatory access to 911 and E911 services, and whether such access is provided at an equivalent level of quality. Not only is such access one of the vital elements of the Section 271 competitive checklist,<sup>3</sup> but the failure of an incumbent ILEC to

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<sup>1</sup>In the matter of the complaint of City of Southfield against Ameritech Michigan, MPSC Case No. U-11229 (Proposal for Decision, July 9, 1997) ("Southfield 911 Complaint").

<sup>2</sup>According to the PFD, a similar misrouting of an E911 call by Ameritech Michigan involving a customer of MFS occurred in January, 1997. See, PFD at p. 9.

<sup>3</sup>See, 47 U.S.C. §271(c)(2)(B)(vii)(I)(1996).

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July 18, 1997

Mr. William F. Caton

Federal Communications Commission

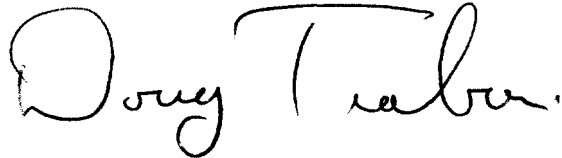
Ameritech Application, CC Docket No. 97-137.

Page 2

properly carry out its duties with respect to 911 and E911 matters can have serious impact on consumers of telecommunications services.

Teleport Communications Group Inc. respectfully requests that the Commission add the attached PFD to the record in the instant proceeding. Please feel free to contact me if you have any questions regarding the subject of this letter, or if additional information is required. Thank you.

Very truly yours,

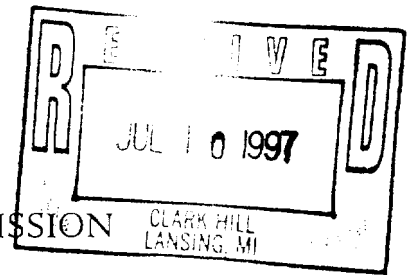
A handwritten signature in black ink, reading "Doug Trabaris". The signature is written in a cursive, flowing style.

Douglas W. Trabaris

Senior Regulatory Counsel, Central Region

cc: Ms. Waxman  
Ms. Whitesell

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION



\* \* \* \* \*

In the matter of the complaint of the )  
CITY OF SOUTHFIELD against )  
AMERITECH MICHIGAN. )  
\_\_\_\_\_ )

Case No. U-11229

NOTICE OF PROPOSAL FOR DECISION

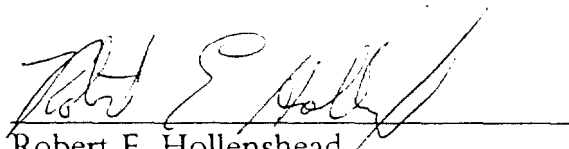
The attached Proposal for Decision is being issued and served on all parties of record in the above matter on July 9, 1997.

Exceptions, if any, must be filed with the Michigan Public Service Commission, P.O. Box 30221, 6545 Mercantile Way, Lansing, Michigan 48909, and served on all other parties of record on or before July 23, 1997, or within such further period as may be authorized for filing exceptions. If exceptions are filed, replies thereto may be filed on or before July 30, 1997. An original and 15 copies of either document are necessary to meet proper filing requirements, as well as proof of service on all other parties of record.

At the expiration of the period for filing of exceptions, an Order of the Commission will be issued in conformity with the attached Proposal for Decision and will become effective unless exceptions are filed seasonably or unless the Proposal for Decision is reviewed by action of the Commission. To be seasonably filed, exceptions

must reach the Commission on or before they are due.

MICHIGAN PUBLIC SERVICE COMMISSION

A handwritten signature in dark ink, appearing to read "Robert E. Hollenshead", is written over a horizontal line.

Robert E. Hollenshead  
Administrative Law Judge

July 9, 1997  
Lansing, Michigan  
dp

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \* \*

In the matter of the complaint of the	)	
CITY OF SOUTHFIELD against	)	Case No. U-11229
AMERITECH MICHIGAN.	)	
_____	)	

PROPOSAL FOR DECISION

PREFACE

This proceeding involves a complaint by the City of Southfield (Southfield) against Ameritech Michigan (Ameritech) concerning emergency 9-1-1 service which Ameritech provides to Southfield. On October 21, 1996, Southfield's City Administrator, Mr. Robert R. Block, sent a letter to Commission Chairman Mr. John Strand indicating that Southfield had been encountering a serious problem concerning the Enhanced 9-1-1 (E9-1-1) database utilized in Southfield. In his letter, Mr. Block indicated that Ameritech had made a commitment to correct a problem concerning telephone customers receiving basic local exchange service from competitive local exchange carrier (CLEC) TCG Detroit (TCG).

Mr. Block further indicated in his October 21, 1996 letter, that Ameritech had committed itself to correcting a problem concerning TCG end-users by October 1, 1996. Mr. Block stated that in spite of this commitment, on October 12, 1996, an in-progress shooting was reported on the 9-1-1 system by callers who were customers of TCG.

When these customers reported this shooting utilizing the 9-1-1 system, their calls were classified as "Record Not Found" and the calls were routed by default to the Oakland County Sheriff's Department instead of to Southfield.

After this letter was received by the Commission, it was considered a formal complaint thus starting this proceeding. Parties to this proceeding are the Complainant, Southfield, the Respondent, Ameritech, the Commission Staff (Staff) and Intervenors TCG and Michigan Attorney General Frank J. Kelley (Attorney General). Staff, the Attorney General, and TCG have all expressed their support of Southfield's position against Ameritech.

### **HISTORY OF PROCEEDINGS**

The Commission received Southfield's complaint on October 24, 1996 and on October 29, 1996, the Commission served a copy of the complaint on Ameritech. Ameritech then submitted its answer to the complaint on November 26, 1996. A prehearing conference was thereafter held on November 12, 1996 during which Staff entered its appearance and TCG was permitted to intervene. The Attorney General filed a notice of appearance and intervention dated March 26, 1997 and the Attorney General was allowed to intervene on May 7, 1997.

Southfield filed its direct testimony and exhibits on March 18, 1997. On April 8, 1997, Ameritech, Staff and TCG filed their direct testimony and exhibits. On April 18,

1997, Ameritech and TCG filed rebuttal evidence. Cross-examination of all witnesses took place on May 7 and 8, 1997. All parties submitted original briefs. All parties except the Attorney General submitted reply briefs. The transcript record consists of three volumes and totals 527 pages and 25 exhibits have been received in evidence. Administrative Law Judge Robert E. Hollenshead presided over all the proceedings.

### **POSITIONS OF THE PARTIES**

#### **Southfield**

Southfield contends that Ameritech, as the incumbent local exchange carrier (ILEC), should have the specific responsibility of maintaining the 9-1-1 database affecting Southfield. Southfield also contends that the standard and goal for maintenance of the 9-1-1 database is zero tolerance for error. Southfield further contends that there must be 100% verification of the accuracy of the 9-1-1 database and that Ameritech should bear the cost of verification and error correction. Additionally, Southfield contends that the Commission should establish penalties for failure to correct database errors in 24 hours and that Ameritech should be required to report verification and error correction procedures. Finally, Southfield contends that Ameritech should reimburse Southfield for its expenses, including attorney fees, which Southfield undertook concerning this proceeding.

## Staff

Staff contends that Ameritech has not provided Southfield with the necessary quality level of 9-1-1 service. To remedy this problem, Staff proposes adoption of its "Rehabilitation Plan for Ameritech's 9-1-1 Service" (Exhibit S-14). This rehabilitation plan contains four sections: Part I, Responsibility; Part II, Rehabilitation Procedures; Part III, Financial Matters; and Part IV, Enforcement. Part I makes Ameritech responsible for the accuracy of its 9-1-1 system and databases. Part I also makes Ameritech responsible for allowing non-discriminatory access by other providers to its databases in a timely and accurate manner. Part II requires Ameritech to perform a 100% verification of the systems and databases used to provide 9-1-1 service in Michigan. Part III requires Ameritech to pay the entire cost of verification and correction of errors with no pass-through to local governments or to Ameritech's regulated service customers. Part IV requires Ameritech to make corrections in the 9-1-1 system or databases within 24 hours. For each error not corrected within 24 hours, Ameritech is to pay a fine of \$1,000. Ameritech is to pay an additional fine of \$1,000 for each additional 24-hour period it takes to correct the error.

## TCG

TCG contends that Ameritech alone has the responsibility for maintaining the integrity of customer name, number and location information once it is contained in the



Ameritech E9-1-1 database. TCG contends there are problems with both data entry and data integrity which Ameritech has not resolved. TCG contends that the Commission should address the serious public safety and anti-competitive issues raised by these problems and ensure that these problems are resolved.

#### Attorney General

The Attorney General contends that all 9-1-1 calls must be accurately processed and, to accomplish this, the Attorney General contends that there should be a 100% verification of the accuracy of the E9-1-1 database. The Attorney General supports adoption of Staff's proposed rehabilitation plan. The Attorney General contends that, because of the infancy of the level of competition in the local telecommunications market in Michigan, there must be some entity held accountable for maintaining the accuracy and integrity of the E9-1-1 system.

#### Ameritech

Ameritech contends it is and has been providing E9-1-1 service to Southfield customers in accordance with the Oakland County Final Plan, Ameritech's tariffs and Michigan law. In order for Southfield to prevail in this proceeding, Ameritech contends that Southfield must show that Ameritech violated 1986 PA 32 (Act 32), the Oakland County Final Plan for provision of E9-1-1 service or Ameritech's tariff for E9-1-1 service. Ameritech claims that Southfield has failed to show any such violations. Ameritech

further contends that Southfield has not shown Ameritech's actions constitute gross negligence or willful and wanton misconduct. Ameritech contends that Staff's proposed rehabilitation plan unreasonably shifts duties to Ameritech, that it changes the duty of care and that it rewrites Ameritech's existing 9-1-1 tariff and the Oakland County Final Plan. Ameritech contends that its solution to the problem presented in this case is adoption of its proposed solution set forth at Exhibit R-19.

### **EVIDENCE PRESENTED**

Southfield presented evidence by one witness, Ms. Catherine L. McCormick, Southfield's Civilian Operations Director for its Department of Public Safety. Ms. McCormick's responsibilities include the supervision and administration of Southfield's Public Safety Answering Point (PSAP). In addition to her direct responsibilities for Southfield, Ms. McCormick serves on the Energy Telephone Service Committee for the state of Michigan, the National Emergency Number Association (NENA) and the Michigan Communication Directors Association (MCDA).

Ms. McCormick indicated that Southfield participates in the Oakland County Final Plan which was adopted in 1986. Ms. McCormick indicated that Southfield first experienced problems involving CLECs in May of 1995 and that she submitted an initial Trouble Report to Ameritech in May 1995. Ms. McCormick stated that in response, Ameritech's 9-1-1 database personnel advised her that they were aware of the problem

and that they were working on a solution to it on a state-wide basis.

When the problem was not corrected by Ameritech, Ms. McCormick brought the problem to the attention of the Emergency Telephone Service Committee (ETSC) on May 16, 1996. Mr. John Hunt, a senior Ameritech executive and a member of the ETSC, indicated that he was not aware of the problem but that he would look into it. However, when the problem continued, Ms. McCormick contacted Ameritech executive, Mr. Mike Sexton, a 9-1-1 executive of Ameritech. Ms. McCormick stated that Mr. Sexton then brought TCG into consideration of the problem. Ms. McCormick stated that Mr. Sexton indicated that Ameritech would first begin working on the problem by correcting database information of TCG customers and then Ameritech would proceed to other problems. In September 1996, Mr. Sexton informed Ms. McCormick that the process of correcting the 9-1-1 database was moving forward.

On September 5, 1996, Ms. McCormick again brought up the problem Southfield was having with the 9-1-1 database at a meeting of the ETSC and Ameritech's Mr. Hunt again advised that he was not aware of the problem. At this meeting, Ms. Marilyn Moore, this Commission's representative on the ETSC, asked Ms. McCormick to submit Southfield's concerns in writing to the Commission for review and action.

On September 11, 1996, Southfield's City Administrator, Mr. Block, wrote Mr. William Celio, the Director of the Commission Staff's Communication's Division

and advised him of the problem Southfield was experiencing when customers were being served by Competitive Access Providers. After this letter, Mr. Block and Ms. McCormick met with Mr. Harry Semerjian, Ameritech's Vice President of Corporate Planning on September 17, 1996. On September 26, 1996, Ameritech's Director of Regulatory Affairs, Ms. Kelly Fennell, wrote Mr. Block and Mr. Celio and advised that Ameritech expected to complete necessary changes to correct all effected end users in TCG's 810/204 exchange by October 1, 1996. In her letter, Ms. Fennell also indicated Ameritech's completion dates for correcting TCG's remaining exchanges, and completion dates for review of E9-1-1 records related to lines assigned to resellers. In addition, Ms. Fennell advised that corrections had already been completed for Brooks Fiber's end-users and that work was under way concerning records of MFS and MCI Metro.

Ms. McCormick indicated that Ameritech did not carry through on the commitments set forth in Ms. Fennell's September 26 letter. Specifically, while Ameritech indicated that corrections would be made to names and addresses in the TCG 204 exchange, a serious incident took place on October 12, 1996 in which a shooting took place at the Silver Triangle Building in Southfield. 9-1-1 calls made from TCG end-users at the scene of this incident were misrouted to the Oakland County Sheriff Department instead of being routed to Southfield's Department of Public Safety. In addition, the Automatic Line Information (ALI) feature of these calls did not show an address.

On October 21, 1996, Southfield's City Administrator, Mr. Block, wrote Commission Chairman, Mr. Strand, and told him of the problem Southfield was having with Ameritech and requested Commission assistance in solving this problem. It was this letter that became the complaint for this proceeding.

In addition to the problems previously discussed, Ms. McCormick indicated that, in late summer or September 1996, Ameritech contracted out maintenance of its 9-1-1 database to SCC, a vendor located in Colorado. Ms. McCormick indicated that, at this point, Southfield was instructed to submit its Trouble Reports to SCC. Ms. McCormick indicated that after SCC took over the handling of trouble reports, Southfield experienced an increase in the frequency of database errors, as well as a slow-down in investigation and correction of problems concerning 9-1-1 service.

Ms. McCormick indicated that on January 30, 1997 another serious incident took place. A robbery took place at John Darakdjian Jewelers in Southfield during which shots were fired. A 9-1-1 call concerning this robbery was made by a customer of MFS, another CLEC. The ALI feature of this call showed an incorrect address.

Staff witness Mr. Celio testified that Ameritech was not providing the necessary quality level of 9-1-1 service especially concerning service provided by CLECs. As a result of this failure by Ameritech, Mr. Celio proposed that a quality standard be established for providing 9-1-1 service to counties and end-users. Mr. Celio indicated that while statistical methods may be reasonable to determine levels of

telecommunication service quality, load forecasting and financial modeling, there is no acceptable error rate when it comes to matters of public safety.

Mr. Celio presented Staff's proposed "Rehabilitation Plan for Ameritech's 9-1-1 Service", which was admitted into evidence as Exhibit S-14. Mr. Celio stated that this plan was to provide a solution to Southfield's 9-1-1 database problem because it had become apparent that Ameritech was not taking responsibility to solve the problem. Mr. Celio stated that since CLECs gives Ameritech the name, address and telephone number of the CLEC's end-use customers, Ameritech was taking the position that it was not responsible for the accuracy of this information.

Mr. Celio stated that Staff's rehabilitation plan is composed of four parts: Responsibility, Rehabilitation Procedures, Financial Matters and Enforcement. Part I, Responsibility, makes Ameritech responsible for the accuracy of the 9-1-1 system and its databases. Mr. Celio stated that Part I makes Ameritech responsible for the correct information appearing on the PSAP screen and makes Ameritech responsible for taking measures to ensure verification, correction and ultimate accuracy of this information. Mr. Celio stated that if Ameritech believes it has a problem in getting correct information in the proper format from CLECs, Ameritech can require this in their interconnection agreements and tariffs. Mr. Celio further stated that Part I makes Ameritech responsible for providing non-discriminatory access by other providers to its databases in a timely and accurate manner.

Mr. Celio stated that Part II of Staff's rehabilitation plan requires Ameritech to perform 100% verification of the systems and databases used to provide E9-1-1 service. Mr. Celio stated that this verification is to be completed within 30 days of an order in this case. Mr. Celio stated that this verification requires identification of every error, the reason for the error, the corrective action taken concerning each error and the time it took to complete these corrections. Further, Mr. Celio stated that Ameritech is to provide monthly reports of the 100% verification of changes to the systems and databases during the 12 months following the first verification report. Finally, Mr. Celio stated that, for the next 24 months, Ameritech is to perform quarterly 100% verifications of changes to systems and databases and file reports on these quarterly verifications.

Mr. Celio stated that Part III, Financial Matters, requires Ameritech to pay the entire cost of verification and correction progress without any pass-through of these costs to local governments or to Ameritech's regulated service customers. Mr. Celio also stated that these costs are not to be included in the calculation of Ameritech's long-run incremental costs. Finally, Mr. Celio stated that Ameritech is to reimburse providers, counties, and end-use customers for all direct costs associated with activities resulting from errors in the 9-1-1 systems and databases.

Mr. Celio stated that Part IV, Enforcement, requires Ameritech to make corrections to 9-1-1 databases or to the 9-1-1 system within 24 hours regardless whose

fault caused the error. Part IV also provides that for each error not corrected within 24 hours, Ameritech is to pay a fine to the state of Michigan in the amount of \$1,000 and an additional \$1,000 fine is to be paid for each 24-hour period it takes to correct the error.

TCG sponsored one witness in this proceeding, Mr. Michael Pelletier, TCG's Director of Carrier Relations. Mr. Pelletier presented both direct and rebuttal testimony. Mr. Pelletier indicated that the purpose of his direct testimony was to clarify the responsibilities of TCG, Ameritech and Southfield for providing information concerning E9-1-1 service.

Mr. Pelletier indicated that TCG provides Ameritech with TCG's customer names, addresses and telephone numbers to be included in the ALI database. Mr. Pelletier stated that TCG has no direct access or direct control over the 9-1-1 database, and that, as a result, TCG has to rely on Ameritech to diagnose and correct existing errors in the 9-1-1 database. Mr. Pelletier claimed that since Ameritech alone was responsible for maintaining the 9-1-1 database, only Ameritech should be held responsible for the accuracy of the 9-1-1 database. Mr. Pelletier stated that in order for TCG to share responsibility with Ameritech for the accuracy of the 9-1-1 database, TCG would have to have real-time access to monitor the data entered for TCG customers on a forward-going basis. Mr. Pelletier stated that he supported Southfield's recommendation that Ameritech perform a 100% audit of the existing database.



Mr. Pelletier also presented specific testimony concerning the October 12, 1996 incident. Mr. Pelletier claimed that TCG provided Ameritech with information concerning a telephone number involved in the October 12 incident and that Ameritech entered this information into the 9-1-1 database on March 13, 1996. Mr. Pelletier claimed, however, that some time between August 6, 1996 and October 12, 1996, Ameritech purged this information.

Ameritech presented testimony by three witnesses: Mr. Patrick A. Harrison, Ameritech's Area Manager 9-1-1 Operations, Ms. Cheryl D. Ali, Ameritech Database Manager, and Ms. Kelly Ann Fennell, Director, Regulatory Affairs for Ameritech Michigan.

Mr. Harrison stated that the purpose of his testimony was two-fold. First, he described how Ameritech's 9-1-1 database functioned. Second, he described Exhibit R-19, which was a document developed by Ameritech to provide guidance to all CLECs on how to have their end-user data inputted into the 9-1-1 database. Mr. Harrison stated that there are three areas for ongoing safeguards concerning Ameritech's 9-1-1 database; File Comparisons & Reconciliation; Database Input & Error Correction Analysis; and Front-End Process Analysis.

Mr. Harrison stated that File Comparisons and Reconciliation compares source data to the 9-1-1 database entry for each phone number and identifies discrepancies. Mr. Harrison stated Ameritech had completed a review of 427,674 records in the Detroit

Metro area and, as a result, added 12,232 records to the 9-1-1 database.

Mr. Harrison stated that the Database and Input & Error analysis involves daily analyzation of errors and the Front-End Process Analysis provides review of the inputs to the 9-1-1 database generated by Ameritech's order systems. Mr. Harrison stated that Ameritech had an objective of an accuracy rate of 99% and that achieving anything more was not reasonable. Mr. Harrison claimed it was not reasonable for Ameritech to be the only party responsible for the accuracy of the databases since all telephone service providers have responsibility for data included in the 9-1-1 database. Mr. Harrison claimed that Ameritech's responsibility involved delivering to the database data for Ameritech end-users and data for CLECs served by Centrex resale or wholesale/resale. Mr. Harrison also claimed that Ameritech should be responsible for processing all updates submitted by CLECs in a timely manner.

In conclusion, Mr. Harrison claimed that Ameritech's 9-1-1 database was a complex system which depends on a number of sources to be complete and accurate. Mr. Harrison further claimed that Ameritech had incorporated many error checking and review points to test the accuracy and completeness for its 9-1-1 database. He also claimed that Ameritech has outlined responsible parties at each of its quality tracking points and has identified the appropriate remedy and timeline to maintain complete and accurate information.

Ameritech's witness, Ms. Ali, stated that her testimony related to actions taken

by Ameritech in the fall of 1996, to clean up and reload TCG end-user data into the 9-1-1 database. Ms. Ali stated that one of the telephone numbers involved in the October 12, 1996 incident was 810/204-1123. Ms. Ali stated that, in August 1996, a trouble ticket had been submitted on this phone number by Southfield, and that this trouble ticket indicated that TCG was the customer's name and that Ameritech's central office address was the location of this customer. Furthermore, Ms Ali stated that the trouble ticket for this October incident indicated "no record found".

Ms. Ali stated that when Ameritech's vendor investigated, a disconnect or out of service message was received. Ms. Ali also stated that after investigating, Ameritech found a systematic problem. Ms. Ali stated that when TCG was assigned NXX's for their use, Ameritech's billing system automatically generated orders to reserve those telephone numbers (TNs). These orders then flowed through to the 9-1-1 database and populated the TNs with TCG's name and Ameritech's central office address where TCG was collocated. Ms. Ali stated that this process has now been changed so as to remove the problem.

Ms. Ali stated that by mid-November 1996 all 810/204 NXXs had been loaded except for the 479 records that were in error. Ms. Ali stated that on November 13, the full set of TN records in error were faxed to TCG. Ms. Ali claimed that Ameritech has now taken all steps it can concerning these TNs and it is now waiting for response from TCG.

Ameritech's witness, Ms. Fennell stated that the purpose of her testimony was to describe Ameritech's actions prior to the inception of this complaint proceeding. She also stated that she was providing results to date of Ameritech's effort to perform a 100% compare of CLEC end-user data in the Michigan 9-1-1 database. Ms. Fennell stated that Ameritech had intended to have accounts in the 810/204 NXX checked for accuracy and completeness and to have had these accounts updated as needed by October 1, 1996. Ms. Fennell stated that Ameritech did not complete this process until October 18, 1996.

Ms. Fennell stated that, at the time of the prehearing conference in this proceeding, Ameritech agreed to develop a set of procedures that could be used to resolve 9-1-1 database discrepancies which might exist with regard to CLEC end-users. Ms. Fennell stated that these procedures are set forth in a document entitled "9-1-1 Database Integrity: Process in a Multiple Local Exchange Environment" which was sponsored by Mr. Harrison as Exhibit R-19. Ms. Fennell claimed that Exhibit R-19 has received industry comment and approval.

Ms. Fennell also presented testimony involving incidents concerning other CLEC end-users in Southfield. Ms. Fennell stated that Southfield's Trouble Reports showed incidents involving MFS end-users and, in particular, referred to the shooting incident on January 30, 1997. Ms. Fennell stated that this incident concerned an MFS end-user served via resale of Ameritech's Centrex service. Ms. Fennell stated that, in this situation, "MFS" appeared rather than the end-user's name and "MFS" old address

appeared as the end-user's address.

Ms. Fennell stated that Ameritech has performed a manual review of 10% of the access lines associated with MFS' Southfield Centrex and found 65% of the records contained data errors in the 9-1-1 database. Ms. Fennell stated that, as a result, Ameritech committed to performing a 100% compare for all MFS' Centrexes. Ms. Fennell stated that this comparison of all MFS Centrexes was completed on March 14, 1997 and that this comparison has resulted in fixing the problem with MFS end-users.

Ms. Fennell stated that are two other CLECs that use resale of Ameritech's Centrex service to serve end-users: Coast-To-Coast Telecommunications (Coast-To-Coast) and Building Communications Inc. (BCI). Ms. Fennell stated that the same review process is being used for these carriers and that Coast-to-Coast's review expected to be completed by April 30, 1997 and BCI's review expected to be completed by May 20, 1997.

Ms. Fennell stated that Ameritech has completed a review of the 9-1-1 database for wholesale/resale end-use customers. Ms. Fennell stated that because of the fewer number of records involved, Ameritech performed a manual 100% compare for wholesale/resale records. Ms. Fennell indicated that this review is complete and that it showed an error rate of 5%.

Finally, Ms. Fennell discussed the status for a 100% compare of facility-based

CLECs. Ms. Fennell stated that for this group, the CLEC has the end-user information which has to be passed on to Ameritech in an accurate, complete and timely manner.

Ms. Fennell claimed that the best process to complete the 100% compare for facilities based CLECs is to perform a mechanized compare of an extract of the CLECs' billing system to entries in the 9-1-1 database. With this process, the CLEC provides a tape, disk or electronically transferred file of its end-user data in a standard format. A computer process is then run to compare this file to the entries in the 9-1-1 database and discrepancies are identified. These discrepancies are then returned to the CLEC for clarification within one business day of identification. The CLEC then provides appropriate updates to the 9-1-1 database to correct the discrepancies.

Ms. Fennell stated that there are four CLECs in Michigan that are facilities based and are interconnected for 9-1-1 service: Brooks Fiber, MFSA, MCI Metro and TCG. Ms. Fennell claimed that the 100% compare for Brooks Fiber was completed in February 1997 and that it showed an 8% error rate.

Ms. Fennell stated that Ameritech has contacted MFS, MCI Metro and TCG to complete their 100% compares. Ms. Fennell stated that MFS and MCI Metro have contacted Ameritech's 9-1-1 personnel to work out procedures to complete their compares. Ms. Fennell stated that TCG has not yet initiated action regarding its 100% compare.

Ms. Fennell stated that Ameritech is willing to commit to a 24-month program

that will perform two full 100% compares. Ms. Fennell further stated that Ameritech will perform 20% compares bi-monthly which will complete a 100% compare over a 10-month period.

In summary, Ms. Fennell stated that Ameritech recognized that there were problems associated with some CLEC end-user data in the 9-1-1 database. Ms. Fennell claimed that Ameritech has taken steps to identify all anomalies related to CLEC end-user data and has taken appropriate corrective action. Ms. Fennell claimed that the integrity of the 9-1-1 database is affected by many factors, some of which are not in Ameritech's control. Finally, Ms. Fennell recommended that the Commission approve use of Exhibit R-19 for addressing 9-1-1 database issues.

TCG witness, Mr. Pelletier, responded in rebuttal to several matters addressed by Ameritech witnesses Ms. Ali and Ms. Fennell. Mr. Pelletier indicated that after Ameritech's vendor received a disconnect or out-of-service message concerning TCG end-users, it proceeded to delete these customers from the 9-1-1 database without consulting TCG or TCG's end-use customers.

Mr. Pelletier stated that TCG was originally assigned five NXX codes for its use and each NXX code had 10,000 TNs assigned. As a result, Ameritech's E9-1-1 database was populated with an incorrect name and address for each of these TNs. Mr. Pelletier further stated that each of these TNs showed the TCG name and the Ameritech central office as the default name and address in the E9-1-1 database. Mr. Pelletier claimed that

this default name and address remained in the system until Ameritech manually updated the information on a number-by-number basis. Mr. Pelletier also claimed that this manual updating caused many of the early problems experienced by the Southfield PSAP.

Mr. Pelletier claims that the 479 errors involving TCG did not occur until after TCG reloaded the E9-1-1 data using magnetic tape as requested by Ameritech. Mr. Pelletier stated that prior to this reloading, TCG provided the information to Ameritech by fax and Ameritech manually entered the information. Mr. Pelletier claimed that all except one of these 479 errors involved Direct Inward Dialing (DID) numbers which were not problematic to the E9-1-1 database since DID numbers are not capable of originating calls.

Mr. Pelletier stated that in response to Ms. Fennell's claim that TCG had not initiated any action regarding the 100% compare, it was not TCG's responsibility to initiate action regarding a 100% compare of the database. Mr. Pelletier claimed that TCG has expended considerable resources in providing data in the format requested by Ameritech and that TCG has responded correctly when notified by Ameritech of database errors.

Ameritech's witness, Mr. Harrison, testified in rebuttal to Staff witness, Mr. Celio, regarding Staff's proposed quality standard for the 9-1-1 database and Staff's proposed requirements for database accuracy and responsibility assignments. Mr. Harrison also



responded to TCG's witness, Mr. Pelletier, concerning a CLEC's role in the accuracy of the 9-1-1 database.

Mr. Harrison claimed that Staff's position concerning the accuracy of processing 9-1-1 calls means that the end-user data contained in the 9-1-1 database must at all times be 100% accurate and this is not reasonable. Mr. Harrison claimed that because of the complexity of the database and the inherent churn of update activity, the database can never be 100% accurate.

Mr. Harrison stated that he had many concerns with Staff's "Rehabilitation Plan for Ameritech's 9-1-1 Service". First, Mr. Harrison stated that he opposed the plan's requirement that Ameritech be designated the sole party responsible for 9-1-1 database accuracy. Mr. Harrison claimed that the name, address, and phone number of non-Ameritech customers is provided from non-Ameritech resources and thus Ameritech has no way of verifying this information short of calling the other telephone company's customers and doing a verbal verification with them. Mr. Harrison also claimed it cannot be Ameritech's sole responsibility for advising, educating and otherwise assisting service providers.

Mr. Harrison stated that Ameritech is opposed to the requirement on Staff's plan to audit the entire 9-1-1 database within a 30-day time frame. Mr. Harrison claimed that it is unnecessary to audit the entire database since there has been no showing of a need for such a process. Mr. Harrison also claimed that this requirement is impossible